

**EXHIBIT A**

**TRUSTEE'S REPLY TO DEFENDANTS' OBJECTIONS AND COUNTERSTATEMENTS**

<b>Trustee Statement</b>	<b>Defendants' Objection</b>	<b>Trustee's Reply to Defendants' Objections</b>	<b>Trustee's Reply to Defendants' Counterstatement</b>
<b>1.</b>	<ul style="list-style-type: none"> <li>• Incorrect and Imprecise</li> <li>• Unrelated to Madoff's Detention</li> </ul>	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>2.</b>	No Dispute	N/A	N/A
<b>3.</b>	Undisputed but Needs Clarification	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>4.</b>	Incorrect, Improper Reliance on Defendants' Answer	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Answer Properly Cited</li> <li>• Immaterial Additional Statements</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed BLMIS operated as sole proprietorship until 2001, and Defendants' accounts were opened prior to then, with BLMIS.</li> </ul>
<b>5.</b>	Incorrect, Improper Reliance on Defendants' Answer	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Answer Properly Cited</li> <li>• Immaterial Additional Statements</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed BLMIS operated as sole proprietorship until 2001, and Defendants' accounts were opened prior to then, with BLMIS.</li> </ul>
<b>6.</b>	Incorrect, Improper Reliance on Defendants' Answer	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Answer Properly Cited</li> <li>• Immaterial Additional Statements</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed BLMIS operated as sole proprietorship until 2001, and Defendants' accounts were opened prior to then, with BLMIS.</li> </ul>

<b>Trustee Statement</b>	<b>Defendants' Objection</b>	<b>Trustee's Reply to Defendants' Objections</b>	<b>Trustee's Reply to Defendants' Counterstatement</b>
<b>7.</b>	Undisputed but Needs Clarification	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>8.</b>	Undisputed but Needs Clarification	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>9.</b>	<ul style="list-style-type: none"> <li>• Improper Legal Argument</li> <li>• Improper Reliance on Court Holdings</li> </ul>	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Disputes Cases were Superseded/Overruled</li> </ul>	N/A
<b>10.</b>	Undisputed but Needs Clarification	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>11.</b>	No Dispute	N/A	N/A
<b>12.</b>	Incomplete and Misleading	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Disputed 509 Account Held by Bernard L. Madoff versus BLMIS</li> </ul>	N/A
<b>13.</b>	<ul style="list-style-type: none"> <li>• Needs Clarification</li> <li>• Discovery Material Sought by Trustee Not Material</li> <li>• Disputed as to Inference</li> <li>• Transfers Not Transfers of BLMIS Property</li> </ul>	No Genuine Dispute	N/A

Trustee Statement	Defendants' Objection	Trustee's Reply to Defendants' Objections	Trustee's Reply to Defendants' Counterstatement
14.	Incorrect, Prior Admission in Error and Contradicted by Documentary Evidence	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Defendants Admitted to Transfers</li> <li>Improper Legal Argument</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed Defendants Received Checks From 509 Account</li> <li>Disputed That 509 Account Held by Bernard L. Madoff versus BLMIS</li> </ul>
15.	<ul style="list-style-type: none"> <li>Trustee Cannot Avoid Obligations</li> <li>Transactions Over Life of Accounts Not Relevant to Avoidance of Obligations or Transfers</li> </ul>	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Improper Legal Argument</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed as to Dates, Withdrawal Amounts, or Account Balances on Account Statements</li> <li>Disputed That 509 Account Held by Bernard L. Madoff versus BLMIS</li> <li>Disputed that Section 548(a)(1) of the Bankruptcy Code is a Statute of Repose</li> </ul>
16.	<ul style="list-style-type: none"> <li>Trustee Cannot Avoid Obligations</li> <li>Transactions Over Life of Accounts Not Relevant to Avoidance of Obligations or Transfers</li> </ul>	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Improper Legal Argument</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed as to Dates, Withdrawal Amounts, or Account Balances on Account Statements</li> <li>Disputed That 509 Account Held by Bernard L. Madoff versus BLMIS</li> <li>Disputed that Section 548(a)(1) of the Bankruptcy Code is a Statute of Repose</li> </ul>
17.	Incorrect	No Genuine Dispute	N/A
18.	Not Material	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	Undisputed

<b>Trustee Statement</b>	<b>Defendants' Objection</b>	<b>Trustee's Reply to Defendants' Objections</b>	<b>Trustee's Reply to Defendants' Counterstatement</b>
<b>19.</b>	Not Material	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	N/A
<b>20.</b>	Not Material	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	N/A
<b>21.</b>	Incorrect	Undisputed	N/A
<b>22.</b>	No Dispute	N/A	N/A
<b>23.</b>	No Dispute	N/A	N/A
<b>24.</b>	No Dispute	N/A	N/A
<b>25.</b>	Correct but Misleading	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Improper Legal Argument</li> </ul>	Undisputed Trustee's Determinations Accurately Quoted
<b>26.</b>	Trustee's Determinations Do Not Reflect Identity of Parties	No Genuine Dispute	Disputed as to Characterization of SIPA Proceedings and Schedules in Trustee's Determinations
<b>27.</b>	No Dispute	N/A	N/A
<b>28.</b>	<ul style="list-style-type: none"> <li>Irrelevant</li> <li>Mischaracterization of Objections to Trustee's Determinations</li> </ul>	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Defendants' Court Filings Remain Relevant</li> </ul>	Undisputed Defendants Included Additional Arguments In Objections to Trustee's Determinations
<b>29.</b>	Improper Legal Argument	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Not Legal Argument but Factual Statement</li> </ul>	N/A

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30.	Improper Reliance on Court Holdings	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Improper Legal Argument</li> <li>Not Legal Argument but Factual Statement</li> </ul>	N/A
31.	<ul style="list-style-type: none"> <li>Not Disputed as to Disallowance of Customer Claims and Objections</li> <li>Improper Reliance on Court Holdings</li> </ul>	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Not Legal Argument but Factual Statement</li> </ul>	N/A
32.	Mischaracterization as to Status of Objections	No Genuine Dispute	N/A
33.	Improper Reliance on Court Holdings	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Not Legal Argument but Factual Statement</li> <li>Disputes Cases were Superseded/Overruled</li> </ul>	N/A
34.	Improper Reliance on Court Holdings	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Not Legal Argument but Factual Statement</li> <li>Disputes Cases were Superseded/Overruled</li> </ul>	Disputed as to Disposition of Defendants' Objections to Trustee's Determinations
35.	Not Material	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Materiality of Factual Statement is for Court to Determine</li> </ul>	N/A

<b>Trustee Statement</b>	<b>Defendants' Objection</b>	<b>Trustee's Reply to Defendants' Objections</b>	<b>Trustee's Reply to Defendants' Counterstatement</b>
<b>36.</b>	Not Material	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Materiality of Factual Statement is for Court to Determine</li> </ul>	N/A
<b>37.</b>	Improper Reliance on Court Holdings	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Not Legal Argument but Factual Statement</li> </ul>	N/A
<b>38.</b>	Incorrect	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Immaterial Additional Statements</li> </ul>	N/A
<b>39.</b>	Disputed as to Inference	No Genuine Dispute	N/A
<b>40.</b>	Undisputed but Needs Clarification	No Genuine Dispute	Undisputed, but Withdrawal Required to be Made with Prejudice
<b>41.</b>	Improper Legal Argument	Factual Statement Informs Court's Disposition of Material Issues	N/A
<b>42.</b>	Incorrect, Improper Reliance on Defendants' Answer	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Improper Legal Argument</li> <li>• Answer Properly Cited</li> <li>• Disputed as to Existence of BLMIS prior to 2001</li> </ul>	<ul style="list-style-type: none"> <li>• Disputed as to Existence of BLMIS prior to 2001</li> </ul>

Trustee Statement	Defendants' Objection	Trustee's Reply to Defendants' Objections	Trustee's Reply to Defendants' Counterstatement
43.	Incorrect, Improper Legal Argument	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> <li>Improper Legal Argument</li> </ul>	<ul style="list-style-type: none"> <li>Disputed as to Existence of Ponzi Scheme</li> <li>Disputed as to Characterization of Defendants' Returns</li> <li>Disputed as to "Early Redeeming Investors"</li> <li>Disputed as to BLMIS's Purchases of Treasuries Were for Customer Accounts</li> <li>Undisputed as to BLMIS's 703 Account</li> <li>Disputed as to Amounts in 703 Account "Held and Invested"</li> <li>Undisputed as to Madoff and BLMIS Employees' Guilty Pleas</li> </ul>
44.	Denied Knowledge or Information in Defendants' Answer	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Are Admissible Evidence</li> </ul>	N/A
45.	<ul style="list-style-type: none"> <li>Improper Reliance on Defendants' Answer</li> <li>Denied Knowledge or Information in Defendants' Answer</li> </ul>	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Answer Properly Cited</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed as to Guilty Plea and Charges</li> <li>Disputed as to Madoff Pleading He Perpetrated Ponzi Scheme</li> </ul>

Trustee Statement	Defendants' Objection	Trustee's Reply to Defendants' Objections	Trustee's Reply to Defendants' Counterstatement
46.	Improper Reliance on Allocutions	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Allocutions Speak for Themselves</li> <li>• Improper Legal Argument</li> <li>• Allocutions Are Admissible Evidence</li> </ul>	N/A
47.	Mischaracterization of Allocation	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Allocutions Speak for Themselves</li> <li>• No Evidence BLMIS Securities Purchases Were for Customer Accounts</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed Madoff and Employees Did Not Execute Split-Strike Strategy</li> <li>• Disputed as to Evidence BLMIS Traded in Treasuries and Other Investments for Customer Accounts</li> </ul>
48.	Improper Reliance on Allocation	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Allocutions Speak for Themselves</li> <li>• Allocutions Are Admissible Evidence</li> <li>• No Evidence BLMIS Securities Purchases Were for Customer Accounts</li> </ul>	N/A
49.	Incorrect, Evidence of Purchases and Trade in Securities, Proceeds Used for Redemption Payments	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• No Evidence BLMIS Securities Purchases Were for Customer Accounts</li> </ul>	N/A
50.	No Dispute	N/A	N/A



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51.	Improper Reliance on Allocution	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> <li>Allocutions Are Admissible Evidence</li> <li>No Evidence BLMIS Securities Purchases Were for Customer Accounts</li> </ul>	N/A
52.	Mischaracterization of Allocution	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed as to Guilty Plea and Charges</li> <li>Disputed as to Characterization of Allocution</li> </ul>
53.	Improper Reliance on Allocution	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> <li>Allocutions Are Admissible Evidence</li> </ul>	N/A
54.	Incomplete	No Genuine Dispute	<ul style="list-style-type: none"> <li>Undisputed as to Guilty Plea and Charges</li> <li>Disputed as to Characterization of Allocution</li> </ul>
55.	Mischaracterization of Allocution	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> <li>Disputed as to Characterization of Allocution</li> </ul>	N/A
56.	No Dispute	N/A	N/A

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<b>57.</b>	Mischaracterization of Allocation	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Allocations Speak for Themselves</li> </ul>	N/A
<b>58.</b>	Incomplete	No Genuine Dispute	<ul style="list-style-type: none"> <li>• Undisputed as to Guilty Plea and Charges</li> <li>• Disputed as to Characterization of Allocation</li> </ul>
<b>59.</b>	Disputed as to Inference	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Allocations Speak for Themselves</li> <li>• No Evidence BLMIS Securities Purchases Were for Customer Accounts</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed Madoff and Employees Did Not Execute Split-Strike Strategy</li> <li>• Disputed as to Evidence BLMIS Traded in Treasuries and Other Investments for Customer Accounts</li> </ul>
<b>60.</b>	Incomplete	No Genuine Dispute	<ul style="list-style-type: none"> <li>• Undisputed as to Guilty Plea and Charges</li> <li>• Disputed as to Characterization of Allocation</li> </ul>
<b>61.</b>	No Dispute	N/A	N/A
<b>62.</b>	Improper Use of Term "BLMIS"	<ul style="list-style-type: none"> <li>• No Genuine Dispute</li> <li>• Disputed 509 Account Held by Bernard L. Madoff versus BLMIS</li> <li>• Undisputed BLMIS Did Not Execute Split-Strike Strategy</li> <li>• No Evidence BLMIS Treasuries Purchases Were for Customer Accounts</li> </ul>	<ul style="list-style-type: none"> <li>• Undisputed Madoff and Employees Did Not Execute Split-Strike Strategy</li> <li>• Disputed as to Evidence BLMIS Traded in Treasuries and Other Investments for Customer Accounts</li> </ul>

Trustee Statement	Defendants' Objection	Trustee's Reply to Defendants' Objections	Trustee's Reply to Defendants' Counterstatement
<b>63.</b>	Improper Use of Term "BLMIS"	<ul style="list-style-type: none"> <li>No Genuine Dispute</li> <li>Allocutions Speak for Themselves</li> </ul>	<ul style="list-style-type: none"> <li>Undisputed Defendants Received Checks from 509 Account</li> <li>Disputed That 509 Account Held by Bernard L. Madoff versus BLMIS</li> </ul>
<b>64.</b>	<ul style="list-style-type: none"> <li>Not Material</li> <li>Improper Legal Argument</li> <li>Mischaracterization of Defendants' Opposition to Trustee's Motion in Limine</li> </ul>	Factual Statements Inform Court's Disposition of Material Issues	N/A